

IRS News Release

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Agreement Identifies U.S. and Swiss Pension Plans for Tax Treaty Benefits

IR-2004-146, Dec. 10, 2004

WASHINGTON — The Competent Authorities of Switzerland and the United States have reached a mutual agreement on the qualification of certain Swiss and U.S. pensions for treaty benefits under paragraph 3 of Article 10 (Dividends) of the U.S.-Switzerland income tax treaty. The agreement also specifies the procedures for claiming treaty benefits in each country and the methods each country uses to grant treaty benefits.

The agreement constitutes a Mutual Agreement in accordance with the Convention Between the United States of America and the Swiss Confederation for the Avoidance of Double Taxation with Respect to Taxes on Income signed at Washington, D.C., on October 2, 1996.

The agreement is linked from the text of this release on the IRS Web site at www.irs.gov/newsroom.